

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

RICHARD GREEN (FINE PAINTINGS),

*Plaintiff,*

-against-

DOYLE MCCLENDON and MARY ALICE  
MCCLENDON,

*Defendants.*

ECF CASE

08 Civ. 8496 (JGK) (JCF)


UNDER SEAL

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that upon the annexed Declaration of John R. Cahill, the exhibits annexed there to, the accompanying Memorandum of Law, and upon the prior pleadings and proceedings in this action, Plaintiff, Richard Green (Fine Paintings), will move, at a date and time to be determined by the Court, for an order, pursuant to Fed. R. Civ. P. 37, compelling the production of documents and imposing attorneys' fees and costs. Pursuant to Court Order, papers in opposition to this motion are due on March 20, 2009, and reply papers are due on March 24, 2009.

Dated: New York, New York  
March 13, 2009

LYNN & CAHILL LLP



John R. Cahill (JC-4299)  
Ronald W. Adelman (RA-8633)  
58 West 40<sup>th</sup> Street  
New York, New York 10018  
(212) 719-4400

*Attorneys for Plaintiff,  
Richard Green (Fine Paintings)*